

GE ENGINEERING, INC.

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JAMES M. GREEN, P.E., DEE
PRESIDENT

LICENSED
NORTH CAROLINA

August 19, 2002

Michael P. Smith, Esq.
Salisbury, Clements, et al
300 West Pratt St.
Suite 450
Baltimore, MD 21201

Subject: A Determination of the Causal Factor of the Accident that Occurred to William Lockwood

Dear Mr. Smith:

Introduction

As you have requested, I have determined the causal factors of the accident that occurred to William Lockwood (the cyclist).

On June 7, 1999, William Lockwood, the cyclist, was riding a Pacific Cycle mountain bike when the suspension fork separated. The separation occurred at the point where the steering tube was inserted into the fork crown.

Engineering Analysis

The pertinent points of this engineering analysis are as follows:

→ Bike Inspection - The subject bicycle was inspected in the offices of GE Engineering, Inc. from June through August 2002. The important points of the inspection are noted as follows:

- The bicycle is a Pacific USA mountain bike with a Shimano Atlas group
- The handlebar clamp is a Kalin.
- The handlebar is a Kalin.
- The serial number is C5J04096 and is located on the underside of the bottom bracket.
- The front fork is a SR Duo Track 7006.
- The front fork is separated from the steer tube at the fork crown.
- The steer tube is designed to go inside of the fork crown tube as noted in Figure 1.
- The steer tube has striations on the outside as noted in Figure 2.
- The fork crown tube has striations on the inside as noted in Figure 3.



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DIPLOMATE, AMERICAN ACADEMY OF ENVIRONMENTAL ENGINEERS; NORTH CAROLINA SOCIETY OF PROFESSIONAL ENGINEERS

**PLAINTIFF'S
EXHIBIT**

1

Inspection of the subject bicycle reveals that the causal factor of the accident was the separation of the fork crown from the steering tube. The steering tube is designed to go inside of the fork crown. Juxtapositioning of the tube with the fork crown reveals a tight fit with no play between the two components.

Microscopic inspection up to 200X magnification reveals no soldering or welding chemical residual to be present.

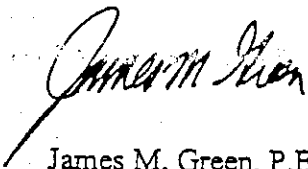
Forces on the Fork Crown – As noted in Figure 4, the head set on a bicycle is designed to dissipate the forces normally associated with riding the bike. The steer tube fits through the upper head race center. The fork crown rests directly under the lower head tube race. The head set basically handles the force dissipation through the upper and lower races. The steer tube is turned by applying force to the handlebars and allowing the race on the upper head tube and the race on the lower head tube to rotate on the bearings. Even under extreme conditions, very little of the overall force on the head set is dissipated onto the head tube or at the junction of the head tube with the fork crown.

Engineering Conclusions

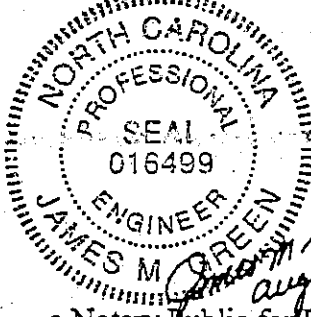
The subject steer tube is designed to fit into the fork crown along the noted striations. The steer tube is designed to then be welded into place so it does not separate from the fork crown. From my examination of the subject cycle, the following conclusions are given with a high degree of Engineering probability.

1. The steer tube was not welded into place so that it would not separate from the fork crown.
2. The fact that the steer tube was not welded into place caused the steer tube to prematurely separate from the fork crown. This failure to weld the steer tube into the fork crown is a manufacturing defect.
3. The premature separation of the steer tube from the fork crown was the direct causal factor of the accident that occurred to the cyclist, William Lockwood.

Best Regards:

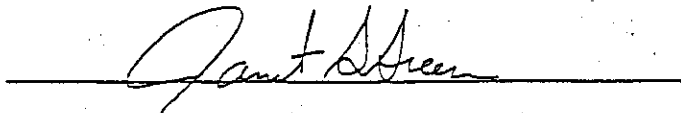


James M. Green, P.E., DEE



I, Janet G. Green, a Notary Public for Buncombe County, North Carolina, do hereby certify that James M. Green personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 22nd day of August, 2002.



My commission expires 09/04/2005.

Figure 1: Inside View of the Steer Tube and the Fork Crown

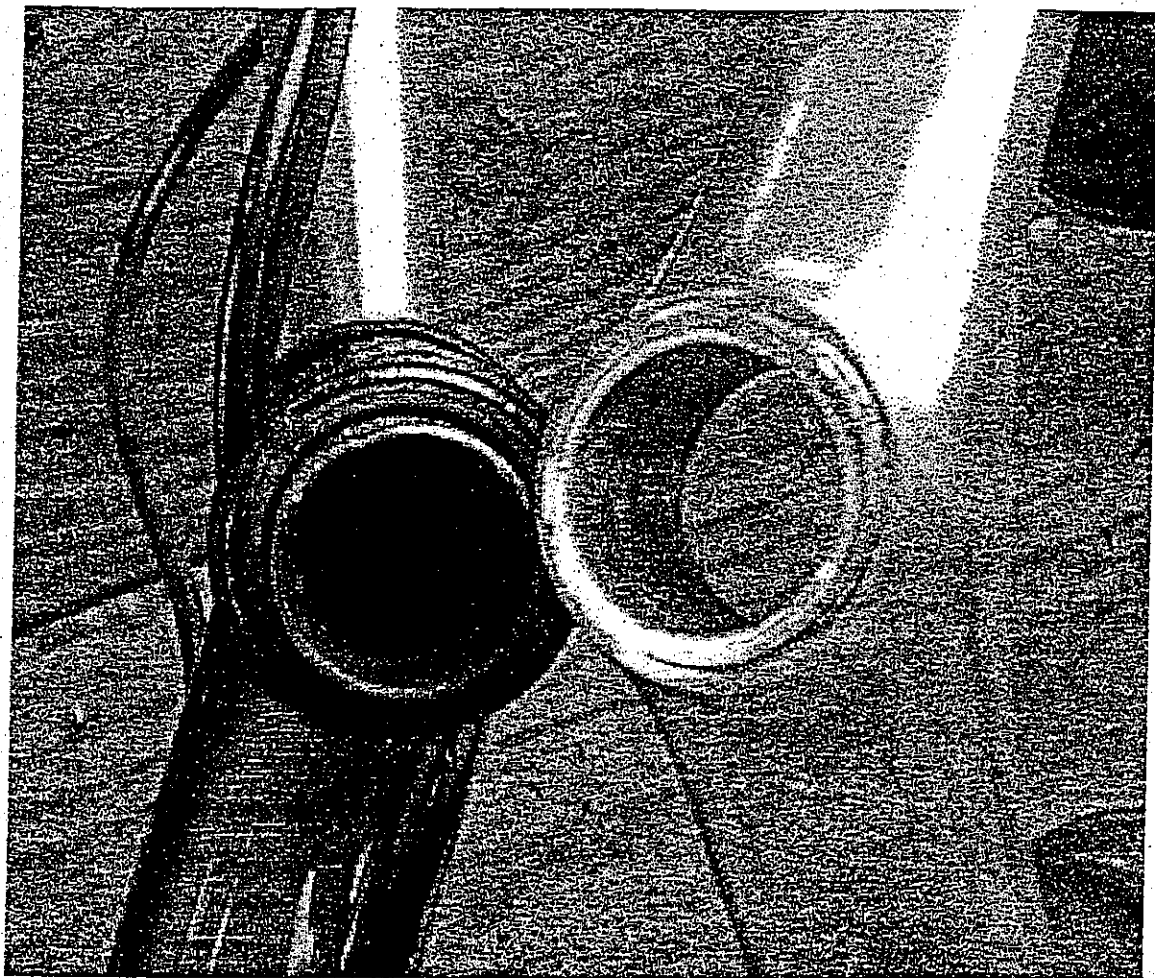


Figure 2: Striations on the Outside Steer Tube

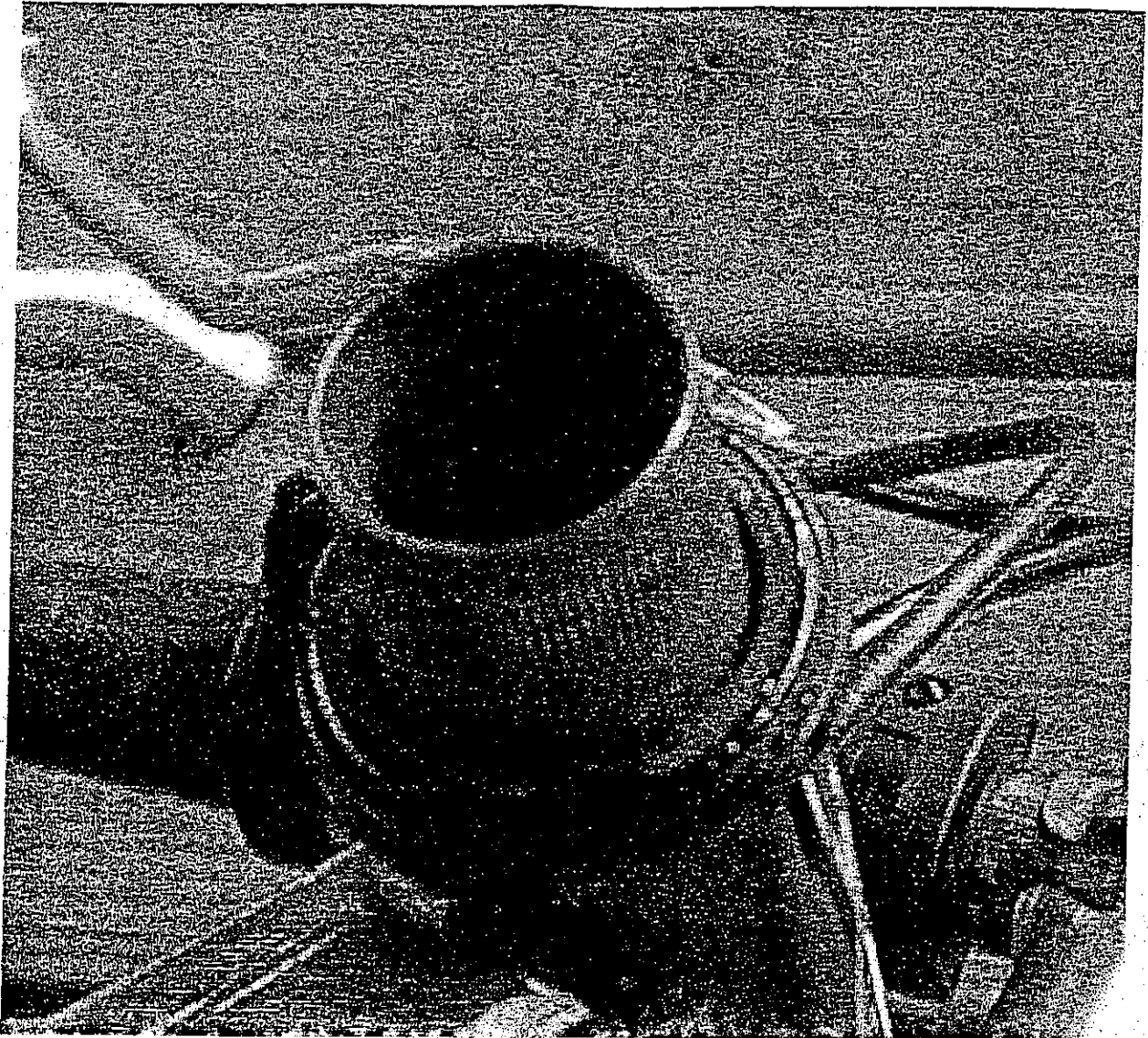


Figure 3: Striations on the Inside of the Fork Crown

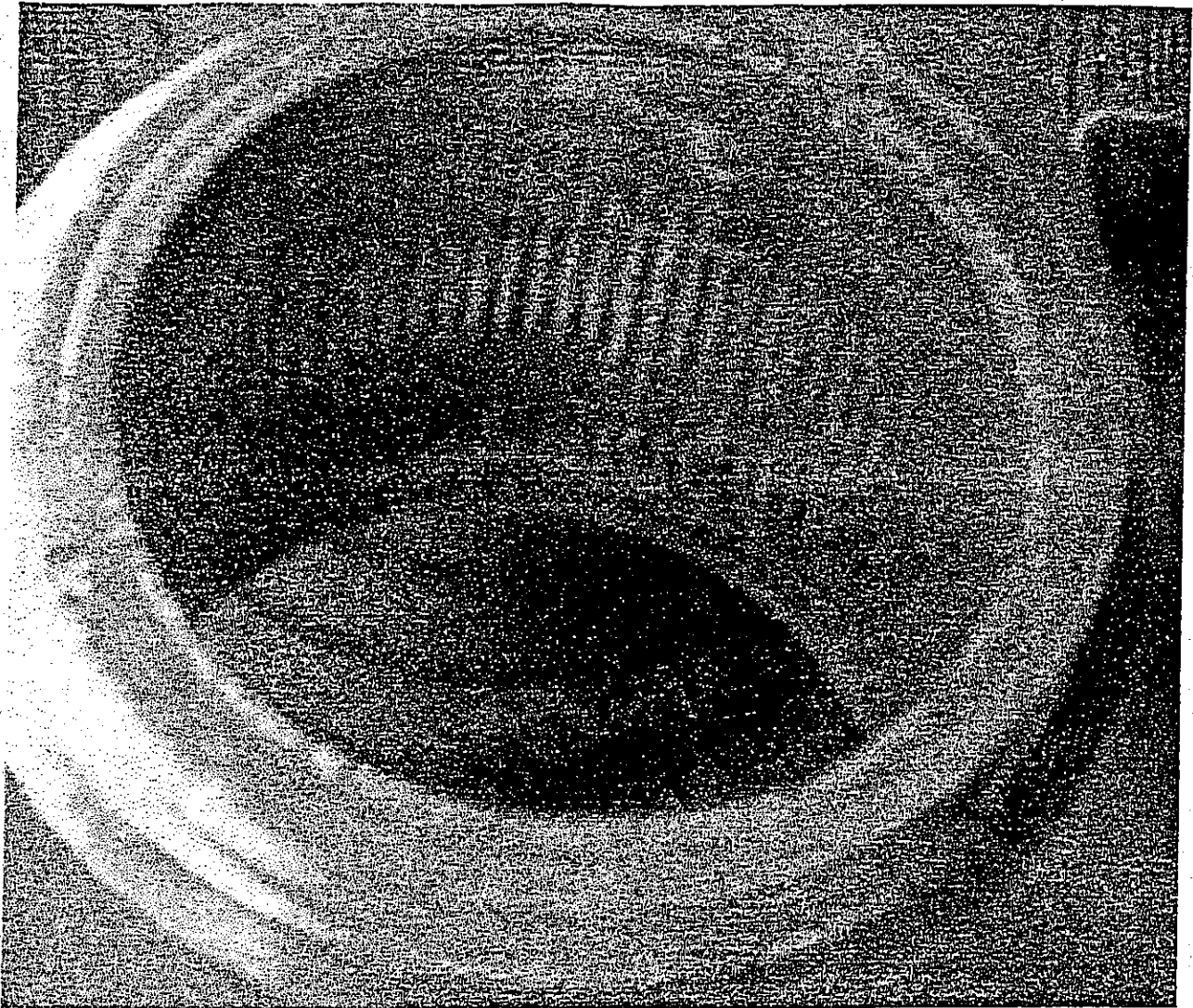
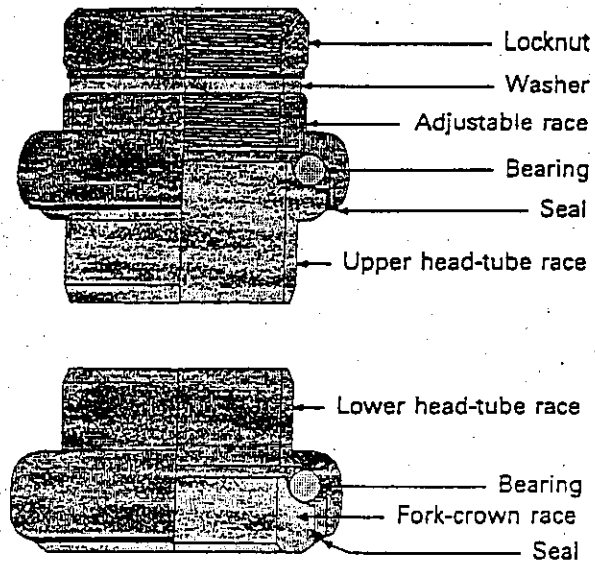


Figure 4: Typical Head Set Components



Appendix

- Bike Case History
- Bike CV
- Fee Schedule
- Literature relied upon:
Green, James M., "Bicycle Accident Reconstruction for the Forensic Engineer," Trafford Publishing, www.Trafford.com, 2001, Catalogue # 01-0466.

Bicycle Case History of James M. Green

Depositions

2002

January 18 *Benjamin Balch v. Moab Bike, Specialized, Joy Industrial Co limited, Merida Industries and Tom Mowatt DBA Tom Mowatt Cycles*, Concord, NH. United States District Court for the District of New Hampshire. Civil Action: C-98-611-SD.

February 20-21 *Sims v. Pacific Cycle USA; Target Stores, Inc.*, Spokane, WA. Superior Court, State of Washington, County of Spokane., No. 00200316-6.

May 30 *Stuart Miller v. The Sports Authority, Inc., v. Huffy*, Miami, FL. In the Eleventh Judicial Court in and for Miami-Dade County, FL. Case No. 00-32181-CA-11.

June 27 *Estate of Theodore Sean Elicker v. City of Albuquerque*, Albuquerque, NM. State of New Mexico, County of Bernalillo, Second Judicial District Court. No. CV-2001 06122.

July 18 *Michael Morin v. William M. Malmuphrey & Berkshire Concrete Corp.*, Boston, MA. Commonwealth of Mass., Berkshire, ss, Superior Court Dept. of the Trial Court, Civil Action No. 00-0338.

2001

February 8 *Cohn v. Ram Racing, Inc., Shimano, Inc., et al*, Tucson, AZ. In the Superior Court of the State of Arizona in and for the County of Pima, No. C333937.

February 16 *Sandra Kissel & Jamey Kissel v. Toy "R" US-Delware, Inc., f/k/a Toys "R" US, Inc. d/b/a Toys "R" US, and Dynacraft Industries, Inc., et al*, Ft. Lauderdale, FL. In the Circuit Court of the 17th Judicial Circuit in and for Boward County, FL, No. 00-010986 (25).

August 10 *Debbie Solorio, Angelmo Nodal v. KMart, Ming-Ta Supply USA, et al*, Phoenix, AZ. In the Superior Court of the State of Arizona in and for the County of Maricopa, No. CV 97-14214.

August 31 *State of Florida v. Reid Wilson*, Daytona Beach, FL. In the Circuit Court, 7th Judicial Circuit of Florida, in and for Viluso County, Case No. 01-31065-CFAES.

November 19 *Donald Hopkins v. Bike Route, Inc., Morrison, Serfas, Inc., Velo Enterprise Co., LTD*, Phoenix, AZ. In the Superior Court of the State of Arizona in and for the County of Maricopa, No. CV-2000-008201.

2000

April 5 *Liam Newman v. HSM, Inc.*, Charlotte, NC. In the General Court of Justice Superior Court Division, County of Mecklenberg, No. 98-CVS-14857.

June 16 *Salvador R. Duzon, et al., v. Stallworth, Queen Bee Transport Venture Transports, Inc., et al., Thibodaux, LA.* In the 17th Judicial District Court, Parish of Lafourche, State of LA, No. 85886.

July 12 *Andrew Boggess, et al. v. Paula Martinelli and David Martinelli, Morganton, WV.* In the Circuit Court of Monongalia County, WV, No. 99-C-34.

August 16 *Walter Stoneham, Dorothy Stoneham v. Nationsbank of Texas, N.A., Mutual Life Insurance Company of New York, San Antonio, Tx.* In the District Court of Bexar County, TX, 131st Judicial District, No. 97-CI-13815.

August 23 *Brett Matherne v. Trek Bicycle, Metairie, LA.* In the 21st Judicial District Court, Parish of Tangipahoa, State of LA, No. 9402924.

August 29, Sept 15 *Hallsten v. City of Chicago, Kenny Construction, et al., Chicago, IL.* In the Circuit Court of Cook County, IL, County Dept. -- Law Division, No. 97-l-1092.

1999

January 20 *Spencer Tracy Jones v. Bechtel, et al., Barnwell, SC.*

February 1 *Trevor Shockley v. Texas A&M, College Park, Tx.*

April 15 *James T. McEntee v. Marcel McCormack, et al, Harahan, LA.*

April 27 *Kennedy v. Invacare, State Court, South Dakota.*

April 28 *Schuermann v. Trek, Beachwood, OH.*

June 11 *Elam v. Downingtown Bicycle Shop, West Chester, PA.*

August 26 *Shaw v. Klein Bicycle & McCully Bicycle Shop, Honolulu, HI.*

November 9 *Jeffery Saad v. Shimano, et al., Waukegan, IL.*

1998

January 13 *Waters v. Trek, Duluth, GA.*

August 20 *Mervis v. Bridgestone/Firestone, Boston, MA.*

September 16 *Carr v. Firenza, Profile Fitness Systems, St. Louis, MO.*

December 15 *Shockley v. Texas A & M, Thomas Industry, Specialized Bike Helmet, College Park, TX.*

1997

January 6 *Dr. Michael Beus v. Trek, IRC Tire Co., et al., Salt Lake City, UT.*

1996

January 17 *Harry Watters v. Kinsel Industries, et al., Houston, TX.*

April 10 *Mastrapa v. Miller, Miami, FL.*

June 11	<i>Donna Toma v. Township of Scotch Plains</i> , Passaic, NJ.
June 13	<i>Estate of Soladay v. Fred A. Nemann Co. & John D. Borland</i> , Ocala, FL.
June 18	<i>Olson v. Cannondale</i> , Richmond, VA.
June 28	<i>Pete Swan v. Speedplay X-2</i> , Riverdale, MD.
August 26	<i>Estate of Soladay v. Fred A. Nemann Co. & John D. Borland</i> , Ocala, FL.
September 26	<i>Matthew Sturdivant v. Huffy Corp., et al.</i> , Cleveland, OH.
October 29	<i>Manee v. Bridgestone, Granpa's Bike Shop, Riverwalk Apartments, et al.</i> , Tampa, FL.
December 6	<i>Surloff v. Cannondale</i> , Lake Worth, FL.
December 16	<i>Thomas Lantz v. Cieslinski, et al.</i> , Milwaukee, WI.
1995	
February 20	<i>Kelly Boone v. Thomas Ely</i> , Raleigh, NC.
February 27	<i>Mary Nelson Moss v. St. Paul Fire and Marine Insur.. Co., et al.</i> , Shreveport, LA.
March 15	<i>Buse v. Middlebury College, et al.</i> , Burlington, VT.
April 4-5	<i>Czaplewski v. Trek, et al.</i> , Milwaukee, WI.
May 12	<i>Najar v. Sombke, et al.</i> , Roswell, NM.
June 6	<i>Obrecht v. Haack's Cycle</i> , Madison, WI.
June 21	<i>Judson Somerville v. Mavic</i> , Boston, MA.
June 23	<i>Minie Emich v. Giant, et al.</i> , Tucson, AZ.
August 11	<i>McBrayer v. Derby Cycle Co.</i> , Dallas, TX.
September 21	<i>Judy Hanson v. Wheels in Motion</i> , Dallas, TX.
October 4	<i>Robert Novy s. USCF</i> , Dallas, TX.
October 25	<i>United States v. Trail King Industries</i> , Sioux Falls, SD.
December 20	<i>Millbaur v. Europa Bicycle Center, et al.</i> , Santa Monica, CA.
December 28	<i>Gale v. Dahon California, Inc., Hon Corp.</i> , Rutland, VT.
December 29	<i>Linda Parkhill v. Sears and Huffy</i> , Gaithersburg, MD.

Trials

2002

May 13-14 *Johnson v. R & M Engineering; Wal-Mart Stores, Inc.*, Fairbanks, AK. In the Superior Court for the State of Alaska, Fourth Judicial District. Case No. 4FA-99-1907 CIV.

May 17 *State of Florida v. Reid Wilson*, Daytona Beach, FL. In the Circuit Court, 7th Judicial Circuit of Florida, in and for Viluso County, Case No. 01-31065-CFAES.

2000

January 18 *Robert Olsson v. Look America Corporation, Shimano America Corporation*, Manhattan, NY. In the State of NY Superior Court.

August 7-8 *Salvador R. Duzon, et al., v. Stallworth, Queen Bee Transport Venture Transports, Inc., et al.*, Thibodaux, LA. In the 17th Judicial District Court, Parish of Lafourche, State of LA, No. 85886.

1999

January Arbitration. *M&C Construction v. Grey Construction*, South Boston, VA/Winston Salem, NC.

June *Shimano v. Sram*, Federal Court, San Francisco, California. Attorney of Record - Jim O'Brien, Esquire, Lewis, Rice and Fingersh, St. Louis, MO.

1998

April 28 *Banks v. NAFTA*, Pasadena, CA.

May 5 *State of NJ v. Robert E. Smith, Jr.*, Turnersville, NJ.

June 17 *Hofman v. Home Shopping Network*, Cherry Hill, NJ.

July 21 *Harris v. Kamath*.

November 4 *Rubel, McDonald, Shamnosky v. Penn. Gas & Water*, Wilkesbarre, PA.

1997

January 20-21 *Thomas Lantz v. Cieslinski, et al*, Milwaukee, WI.

1996

January 28 *Gale v. Dahon California, Inc., Hon Corp.*, Rutland, VT.

February 27 *Millbaur v. Europa Bicycle Center, et al.*, Santa Monica, CA.

July 2 *Olson v. Cannondale*, Richmond, VA.

September 18 *Donna Toma v. Township of Scotch Plains*, Passaic, NJ.

1995

October 18

Estate of Daniel A. Langley v. Bell Sports, Inc., et al., Dallas, TX.



BIKE VITAE

Of James M. Green, P.E., DEE

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EDUCATION

- B.S. Physical Science, University of Maryland/East Tennessee State University
- M.S. Environmental and Occupational Health, East Tennessee State University
- M.S. Civil Engineering, University of Tennessee - Emphasis on Operations Research

EXPERIENCE

- President of GE Engineering, Inc. (formerly Resource Engineering) - An Engineering firm where bicycles are constructed and optimized for high performance, off road- and on road racing. Engineering applications are used to construct bicycles that can withstand stresses of high performance racing. The firm also utilizes a fully equipped laboratory to generate engineering data to determine the causal effects of bicycle accidents. GE Engineering, Inc. is also affiliated with a laboratory that conducts animations and simulations in the area of bicycle accident reconstruction.
- United States Cycling Federation and Regional Bicycle Racer for approximately twenty-five years
- Competitive Bicycle Racer and Rider for 46 years

PROFESSIONAL REGISTRATION

- Registered Professional Engineer (2002)

PROFESSIONAL SOCIETY MEMBERSHIP (2002)

- National Academy of Forensic Engineers (Fellow)
- Professional Engineers of North Carolina
- National Society of Professional Engineers American
- American Society of Civil Engineers (Fellow)
- Professional Engineers in Private Practice

COMMITTEE MEMBERSHIP

- ASTM E30.05 Forensic Engineering - Deals with standards for the practice of Forensic Engineering.
- ASTM F09 Sports/Bicycles - Deals with standards for bicycles and their components.
- Human Powered Transportation Committee, Transportation Research Board, American Society of Civil Engineers - Deals with standards in the Nation's Infrastructure for pedestrian and cycling safety.
- Past Chairman of the Ethics Committee, National Academy of Forensic Engineers and Past President - Deals with the practice of Forensic Engineering.
- Institute of Transportation Engineers - Member of those committees dealing with pedestrians and bicycling.

MISCELLANEOUS MEMBERSHIP (2002)

- Fellow, National Academy of Forensic Engineers (NAFE) -- Elected Vice-President in 1993 by a vote of Professional Engineers in the Academy which is chartered by the National Society of Professional Engineers. Was Co-Chairman of the Ethics Committee from 1992-1995. Was one of the writers of the Code of Ethics for Forensic Engineering. Was President of the Academy for 1995 and was a member of the Board of Directors. The goal of the National Academy of Forensic Engineers is to promote the ethical practice of Forensic Engineering and to exchange technical information through peer reviewed papers and seminars.

AREAS OF EXPERTISE

I have testified, or provided technical support, on behalf of both Plaintiff and Defendant in hundreds of cases involving fatal and non-fatal bicycle and related accidents. A great deal of work has also been accomplished in the area of infrastructure design, construction and operation where the movement of motor vehicles, motorcyclists, bicyclists, and pedestrians are concerned. Of particular interest is the movement of these entities under certain environmental and sight constraints. Due to proprietary agreements, in the Civil Engineering design area, and the desire of most attorneys, in the Forensic Engineering area, not to release case information, a description of the areas in which I have worked is provided. Further details may be obtained upon permission from the case attorney. Expertise in the design area as well as the Forensic Engineering area and BMX include, but are not limited to, the following:

- Cyclist and Pedestrian Movement – Several Civil Engineering design projects have been completed, and are ongoing, on the design and safe operation of facilities where the safety of cyclists and pedestrians are of concern. These projects generally deal with the proper design parameters to allow safe movement of cyclists and pedestrians in traffic. Since intersection design parameters are critical in this movement, a great deal of time has been spent in identifying these parameters in daylight and nighttime conditions.
- Conspicuity – The application of principles of conspicuity in determining the causal factors of cycling accidents has been given a great deal of study by GE Engineering, Inc. (formerly Resource Engineering). Utilizing field test data, as well as a detailed compilation of engineering literature, these areas of conspicuity that are directly applicable to reconstructing cycling accidents have been refined, published, and accepted by the engineering community.
- Investigation in many areas of the Engineering aspects of determining the causal factors of bicycle accidents continues on an ongoing basis (2002). This includes modeling accidents utilizing the data developed through actual on site measurements of thousands of accidents. This information is developed from input from engineers throughout the United States and the rest of the world on a continual basis.
- BMX tracks – An evaluation of the design integrity of BMX race tracks. This includes the evaluation of berm design as it relates to rider accidents. A determination of the vector forces placed on a rider during a jump. This includes determining the trajectory of the bike rider as well as the biomechanics of the rider during the jump. An evaluation of the structural design and integrity of BMX off-road dirt, 10- and 12- speed racing and touring bicycles, including a determination of structural failure associated with impacts from riders jumping or falling.
- A definition of those areas where failure to adequately warn the public of design constraints which was a causal factor in bicycle structural failure/operation. This failure to warn was determined to be, in some instances, a causal factor of an accident from improper bicycle assembly. Other analyses have shown failure to warn not to be a causal factor in certain bicycle accidents.
- A determination of the velocity of impact from the deformation of the cycle has been quantitatively determined in the laboratory. Using static and dynamic forces, deformation on various parts of cycles was recorded. Utilizing most of the major bicycling frames manufactured, this deformation was transmitted to force and speed of impact. These deformation values were also compared to deformation values obtained from accident cycles where it was alleged the cycle was defective. In this manner, it was shown that frontal impact deformation was caused by rider error, not a defective frame as alleged.

- Ethics – Conducted and taught seminars in Professional engineering ethics at North Carolina State University, University of Tennessee, Clemson University and at Professional Engineers of North Carolina seminars.

PUBLICATIONS

Bicycle Accident Reconstruction for the Forensic Engineer, published by Bicycle Books, Inc., 1st Ed., James M. Green, P.E., 1991.

Bicycle Accident Reconstruction: A Guide for the Attorney and the Forensic Engineer, published by Lawyers and Judges Publishing Co., James M. Green, P.E., 1992.

"Nighttime Bicycle Accident Reconstruction," accepted for publication in the *American Society of Civil Engineering Transportation Engineering Journal*, James M. Green, P.E., 1993.

"A Determination of the Causal Factors of Bicycle Accidents," James M. Green, 1990.

"Bicycle Accident Reconstruction Techniques," *Journal of National Academy of Forensic Engineers*, James M. Green, P.E., 1989.

"A Determination of the Causal Factors of Bicycle Accidents at Railroad Crossings," *Journal of the National Academy of Forensic Engineers*, James M. Green, P.E. and Robert T. Hintersteiner, P.E., 1990.

"Determination of the Reaction Times Available to a Cyclist at Different Intersection Configurations," James M. Green, P.E., 1990.

"Highway Intersections – Killing Fields for Cyclists," James M. Green, P.E., 1990.

"The Effect of Conspicuity on Bicycle Accident Reconstruction," James M. Green, P.E., 1990.

"The Role of Component Failure on Bicycle Accident Reconstruction," James M. Green, P.E., 1990.

"The Employee Relationship Between Helmets and Bicycle Accident Reconstruction," James M. Green, P.E., 1991.

"The Impact of Roadway and Cycle Path Design on Bicycle Accident Reconstruction," James M. Green, P.E., 1991.

"A Determination of Braking Distance for Cyclists in Emergency Stopping Situations," James M. Green, P.E., 1993.

"A Determination of the Reaction Times Available to a Motor Vehicle Driver Overtaking a Cyclist at Night," James M. Green, P.E., 1992.

"A Determination of Force onto the Cycle Rider or Pedestrian During the Impact of a Motor Vehicle," James M. Green, P.E., 1992.

"A Determination of the Actual Point of Impact in Bicycle Accident Reconstruction Involving Motor Vehicles," James M. Green, P.E., 1994.

"The Derivation of a Formula for Determining the Speed of a Bicycle Rider Down an Incline," James M. Green, P.E., 1992.

"Basic Engineering and Physics Applicable to Bicycle Accident Reconstruction," James M. Green, P.E., 1992.

"Reconstruction of Bicycle Accidents at Night Utilizing the Principles of Conspicuity," James M. Green, P.E., 1992.

"A Determination of the Correct Method for Developing Motor Vehicle Speed of Impact in Bicycle Accident Reconstruction Collisions Using Engineering Literature and Field Verification," James M. Green, P.E., 1994.

"Determination of the Velocity of a Cyclist From Deformation of the Cycle From a Frontal Impact," James M. Green, P.E., 1994.

"The Engineering Dynamics of a Cyclist Being Thrown Over the Front of a Cycle During a Sudden Stop," James M. Green, P.E., 1994.

"A Determination of the Structural Integrity of Bicycle Frames Subjected to Frontal Static Force," James M. Green, P.E., 1994.

Bicycle Accident Reconstruction and Litigation, published by Lawyers and Judges Publishing Co., 4th Ed., James M. Green, P.E., Paul F. Hill, Esq., & Douglas Hayduck, 1996.

"The Causal Factor of Bus Wheel Injuries and a Remedial Method for Prevention of these Accidents," *Journal of the National Academy of Forensic Engineers*, Vol. XVIII, No. 1, June 2001.

Bicycle Accident Reconstruction for the Forensic Engineer, published by Trafford Publishing, 5th Ed., James M. Green, P.E. and contributing authors, 2001.

"Determining Total Reaction Time for Accident Reconstruction and Civil Engineering Design," submitted to the *Journal of the National Academy of Forensic Engineers*, 2001.

BICYCLE RACING EXPERIENCE

I continue to test components and frames in high stress situations both in the laboratory and in racing situations.

- State of Tennessee Road Racing Bicycle Champion – 1982, 1983.
- Hawaiian Ironman Qualifier and Finisher – February 1981, February 1982, October 1982
- Winner, Veterans Jonesborough 3-day State Race, United States Cycling Federation sanctioned, 1984.
- Team Winner, Tennessee Pro Classic Stage Race, 1984 – First professional road race held in the United States since the 1930's
- Winner – Regional 25-mile Time Trial Championships – Course Record Holder, 1981-1986
- National United States Cycling Federation Qualifier for the National Road Racing Championships, 1982-1988
- Top Ten United States Cycling Federation Time Trial Times, 1982-1987
- Member of the Tri-Cities Road Club and Coors Racing Team, 1981-1989
- Winner, Warriors Path Triathlon in age group, 1981 – 1984, First overall in Bicycle Time Trial
- Fourth, Warriors Path Triathlon in age group, 1986, Second overall in Bicycle Time Trial
- First in Age Group, State of Franklin 100 Mile Road Race, 1987, 1989, 1990
- Fifth in Age Group, Cascade Falls Triathlon, Bend, OR, 1987
- Third, Tullahoma Triathlon, 1990 – Southern Regional Championships; qualified for Nationals, 1.5 K swim, 40 K bike, 10 K run
- Second, Chattanooga Triathlon, 1990, 1.5 K swim, 40 K bike, 10 K run
- First Tennessee State Championship Triathlon, Fort Loudon, TN, 1990, 1.5 K swim, 40 K bike, 10 K run
- Fourth, Muncie, IN, Midwest Regional Triathlon Championship, 1990, 1.2 mile swim, 56 mile bike, 13.1 mile run
- First, Southeastern international distance Triathlon Championship, 1991, Cummings, GA, 1.5 K swim, 40 K bike, 10 K run, Qualified for Nationals
- Third, Tullahoma Triathlon, 1991, 1.5 K swim, 40 K bike, 10 K run
- Eighth, Muncie Endurance Triathlon, Muncie, IN, July 1999
- First in Age Group, Double Dam Triathlon, Lenoir, TN, July 2000, 1.5 K swim, 40 K bike, 10 K run
- Fourth in Age Group, Long Course National Triathlon Championships, Tupper Lake, NY, July 2000, 1.2 mile swim, 56.1 mile bike, 13.1 mile run
- First in Age Group, Festival of Flowers Triathlon, Greenwood, SC, June 2000, International Distance
- First in Age Group, Long Course Mid-Atlantic Triathlon Championships, Raleigh, NC, October 2001, 1.2 mile swim, 56.1 mile bike, 13.1 mile run
- Second in Age Group, Boulder Ironman, Boulder, CO, September 2001, 2.4 mile swim, 112 mile bike, 26.1 mile run
- Sixth in Age Group, Long Course National Championships, Tupper Lake, NY July 2001, 1.2 mile swim, 56.1 mile bike, 13.1 mile run
- First in Age group, Pinehurst International Triathlon, Pinehurst, NC, October 2001
- Third in Age Group, White Lake Half-Ironman, White Lake, NC, May 2001, 1.2 mile swim, 56.1 mile bike, 13.1 mile run

- Eighth in Age Group, Eagleman Half-Ironman, Cambridge, MD, June 2001, 1.2 mile swim, 56.1 mile bike, 13.1 mile run
- Qualified for the United States Long Course Triathlon Team in 2000 and 2001.
- Second in Age Group, USC French Broad River Classic Time Trial, August 2001

The United States Cycling Federation (USCF) road races where I served as Course Engineer or as Race Promoter are as follows:

- Tennessee Pro Classic – This is a one day road race held in the United States since the 1930's. The race consisted of several stages, including a criterium and stage races.
- Johnson City Spring Classic – This is a one day road race held on a completely closed course.
- District USCF Championships – This was a 100 mile road race held over mountainous terrain with multiple support vehicles and multiple classes of racers.
- Greeneville Fun Fest Race – This was a closed course road race involving support crews and multiple classes of racers.
- Kingsport Criterium – This was a closed criterium course consisting of all classes of racers as well as a technically demanding course.

FEE SCHEDULE

The following fee schedule shall apply to any and all services provided by GE Engineering in connection with this project:

James M. Green, P.E. (Pre-Discovery)	\$200.00/hr
James M. Green, P.E. (Discovery, Trial)	\$225.00/hr
Forensic Nurse	\$75.00/hr
Paralegal	\$65.00/hr
Office Manager	\$35.00/hr
Standby for trial or deposition	charged by the day (non-refundable)